



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 6, 2016

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: United States v. Edward Durante et al.,
S4 15 Cr. 171 (ALC)

Dear Judge Carter:

The Government respectfully writes to request an adjournment of the initial pretrial conference for defendant Edward Durante from its currently-scheduled time of 12:00 p.m. tomorrow until Wednesday, January 13, 2016, at 11:00 a.m., which is the date provided by the Court for the newly-arrested out-of-state defendants, Larry Werbel and Sheik F. Khan, a/k/a "Abida Khan," to make their initial appearances. The fourth defendant in the above-referenced Indictment, Christopher Cervino, was arrested this morning in New Jersey and will be presented before the Honorable Andrew J. Peck in Magistrate Court today. The Government anticipates that all four defendants in the above-referenced Indictment will be present on January 13 for arraignment and an initial pretrial conference.

In addition, the Government respectfully requests that time be excluded under the Speedy Trial Act from January 7, 2016, until January 13, 2016, in the interests of justice. Jennifer Willis, Esq., counsel to Durante, consents both to the adjournment request and the exclusion of time.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/
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